

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

In re:

Case No. 19-54823

Shaun Michael Winter

Debtor.

Chapter 7 (Judge Caldwell)

**MOTION TO CONVERT CHAPTER 7 PROCEEDING TO
CHAPTER 13 PROCEEDING**

Now comes Shaun Michael Winter, one of the two debtors in this case, through counsel, and moves this Court to permit the conversion of his case, now pending under Chapter 7, to one under Chapter 13.

/s/ Shaun M Winter
Shaun Michael Winter

/s/ Pamela N. Maggied
Pamela N. Maggied (#0013260)
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PAMELA N. MAGGIED CO., LPA
85 East Gay Street, Suite 600
Columbus OH 43215
614 464-2236 / 614 464-3823 fax

MEMORANDUM

11 U.S.C. Section 706(a) states "The debtor may convert a case under this chapter to a case under chapter ... 13 of this title at anytime, if the case has not been converted under section ... 1307 ... of this title." This case has not been previously converted.

Wherefore, debtor respectfully requests that this Court permit the conversion requested.

/s/ Pamela N. Maggied
Pamela N. Maggied

**NOTICE OF MOTION TO CONVERT CHAPTER 7 PROCEEDING
TO CHAPTER 13 PROCEEDING**

The debtor has filed papers with the court to obtain a conversion of his chapter 7 case to a 13 case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to grant the relief sought in the motion, then on or before **twenty one (21) days from the date set forth in the certificate of service for the motion**, you must file with the court a response explaining your position by mailing your response by regular U.S. Mail to Clerk, U.S. Bankruptcy Court, 170 North High Street, Columbus OH 43215 OR your attorney must file a response using the court's ECF System.

The court must **receive** your response on or before the date stated above.

You must also send a copy of your response either by 1) the court's ECF System or by 2) regular U.S. Mail

to Pamela N. Maggied, PAMELA N. MAGGIED CO., LPA
85 East Gay Street, Suite 600, Columbus OH 43215

and to US Trustee, 170 North High St. 2nd Floor, Columbus OH 43215

and to Faye D. English, Chapter 13 Trustee, One Columbus
10 West Broad Street, Suite 900, Columbus, OH 43215-3449

and to Susan L. Rhiel, Trustee, PO Box 307337, Columbus OH 43230

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an Order granting that relief.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Convert was served (i) electronically on the date of filing through the court's ECF System on all ECF participants registered in this case at the email address registered with the court and (ii) by ordinary U.S. Mail on October 1st, 2019 addressed to the following:

/s/ Pamela N. Maggied

Pamela N. Maggied

All Other parties on attached list